

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

<b>ePLUS INC.,</b>	)	
	)	
	)	
<b>Plaintiff,</b>	)	<b>Civil Action No. 3:09-CV-620 (REP)</b>
	)	
<b>v.</b>	)	
	)	
<b>LAWSON SOFTWARE, INC.,</b>	)	
	)	
	)	
<b>Defendant.</b>	)	

**PLAINTIFF ePLUS INC.'S SUPPLEMENTAL WITNESS LIST**

Pursuant to (i) the Joint Stipulation regarding the pre-hearing schedule was submitted by the parties on February 17, 2012 and (ii) Paragraph 14 of the Court's Scheduling Order for Contempt Proceedings (Docket No. 849), Plaintiff ePlus Inc. ("ePlus") hereby identifies those persons whom it has a good faith basis to believe will be called to give testimony at the contempt hearing that is scheduled to begin on February 27, 2012.

ePlus will supplement and amend the list in light of any order regarding the scope of the trial or the waiver of Lawson's attorney-client privilege, or in light of any information submitted by Defendant Lawson Software, Inc. ("Lawson") as part of its pretrial filings or otherwise. ePlus will present testimony by any witness identified or called by Lawson, or offer additional testimony from any such witness by deposition if necessary. ePlus may call witnesses identified on its witness list or on Lawson's witness list in rebuttal.

In alphabetical order, the names and addresses of the witnesses whom ePlus has a good faith basis to believe will be called to give testimony at the contempt hearing that is scheduled to begin on February 27, 2012 are as follows:

	<b><u>Name</u></b>	<b><u>Address</u></b>	<b><u>Purpose</u></b>
1.	Dale Christopherson	Lawson Software, Inc. 380 Saint Peter Street St. Paul, MN 55102	Fact
2.	Dean Hager	Kroll Ontrack 9023 Columbine Road Eden Prairie, MN 55347	Fact
3.	Scott Hanson	Lawson Software, Inc. 380 Saint Peter Street St. Paul, MN 55102	Fact
4.	Elizabeth Homewood	Lawson Software, Inc. 380 Saint Peter Street St. Paul, MN 55102	Fact
5.	Keith Lohkamp	3045 Totterdell Street Oakland, CA 94611	Fact
6.	Patrick Niemeyer	712 Payson Drive St. Louis, MO 63132-3310	Expert
7.	Alfred Weaver, Ph.D.	University of Virginia School of Engineering and Applied Sciences 151 Engineer's Way P.O. Box 400470 Charlottesville, VA 22904	Expert
8.	Keith Ugone, Ph.D.	Analysis Group 2911 Turtle Creek Boulevard Suite 600 Dallas, TX 75219	Expert

Pursuant to Paragraph 13 of the Court's Scheduling Order for Contempt Proceedings (Docket No. 849), ePlus has also exchanged with Lawson and will submit to the Court the deposition transcripts and deposition exhibits of the following witnesses: Dale Christopherson, Todd Dooner, Dean Hager, Scott Hanson, Elizabeth Homewood, Keith Lohkamp, Kurt Reasoner and Kevin Samuelson. Pursuant to the Court's directive at the November 8, 2011 hearing, the

Federal Rules of Evidence and the Federal Rules of Civil Procedure, *ePlus* intends to introduce these deposition transcripts and deposition exhibits into the record in connection with these contempt proceedings.

Respectfully submitted,

February 17, 2012

/s/

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Jennifer A. Albert (*admitted pro hac vice*)

David M. Young (VSB #35997)

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 17th day of February, 2012, I will electronically file the foregoing

**PLAINTIFF ePLUS INC.'S SUPPLEMENTAL WITNESS LIST**

with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) via email to the following:

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/s/  
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